

## AIR QUALITY PERMIT

Issued To: Concrete Placing Co., Inc.  
6451 West Gowen Road  
Boise, ID 83709

Permit #3319-01  
Administrative Amendment (AA) Request: 9/13/04  
Department Decision on AA Issued: 10/07/04  
Permit Final: 10/23/04  
AFS #: 777-3319

An air quality permit, with conditions, is hereby granted to Concrete Placing Co., Inc. (Concrete Placing), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

### Section I: Permitted Facilities

#### A. Plant Location

Concrete Placing operates a portable central mix concrete batch plant operation at various locations throughout Montana. Permit #3319-01 applies while operating at any location in Montana, except within those areas having a Department of Environmental Quality (Department) approved permitting program, those areas considered tribal lands, or those areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.*

Addendum 2 applies to the Concrete Placing facility while operating at any location in or within 10 km of certain PM<sub>10</sub> nonattainment areas, including the proposed site location. The proposed initial site location has been identified as the NW ¼ of Section 28, Township 28 North, Range 21 West, in Flathead County, Montana. A complete list of the permitted equipment is contained in Section I.A of the Permit Analysis.

#### B. Current Permit Action

On September 13, 2004, Concrete Placing requested an administrative amendment to Permit #3319-00 to update Addendum 1 and allow for wintertime operations in or within 10 km of the Kalispell PM<sub>10</sub> nonattainment area. SCREEN3 VIEW modeling will be applied to allow for wintertime operations.

### Section II: Conditions and Limitations

#### A. Emission Control Requirements

1. Concrete Placing shall install, operate, and maintain the baghouse as specified in their Montana Air Quality Permit Application and all supporting documentation (ARM 17.8.752). Therefore, Concrete Placing shall install, operate, and maintain the baghouse on the weigh hopper, cement silo, and cement supplement silo.
2. Concrete Placing shall not cause or authorize to be discharged into the atmosphere from the ready mix plant:
  - a. Any vent emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304 and ARM 17.8.752).

- b. Any fugitive emissions from the source, or from any material transfer operations, including, but not limited to, truck loading or unloading, which exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.308 and ARM 17.8.752).
  3. Concrete Placing shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308 and ARM 17.8.752).
  4. Concrete Placing shall treat all unpaved portions of the haul roads, access roads, parking lots, and the general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.3 (ARM 17.8.752).
  5. Total plant production shall be limited to 3,066,000 cubic yards of concrete during any rolling 12-month time period (ARM 17.8.749).
  6. If the permitted equipment is used in conjunction with any other equipment owned or operated by Concrete Placing, at the same site, production shall be limited to correspond with an emissions level that does not exceed 250 tons during any rolling 12-month time period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).
- B. Emissions Monitoring
1. Concrete Placing shall inspect the baghouse and its vents, which are used for controlling emissions from the silos and weigh hopper, every 6 months of operation to ensure that each collector is operating at the optimum efficiency. Records of baghouse inspections, repairs, and maintenance shall be kept for a minimum of 5 years (ARM 17.8.749).
  2. Concrete Placing shall maintain on-site records of plant inspections, repairs, and maintenance. All records compiled in accordance with this permit shall be maintained by Concrete Placing as a permanent business record for at least 5 years following the date of the measurement, shall be submitted to the Department upon request, and shall be available at the plant site for inspection by the Department (ARM 17.8.749).
- C. Testing Requirements
1. All compliance source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
  2. The Department may require testing (ARM 17.8.105).
- D. Operational Reporting Requirements
1. If this concrete batch plant is moved to another location, an Intent to Transfer Form must be sent to the Department. In addition, a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The Intent to Transfer Form and the proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765).

2. Concrete Placing shall maintain on-site records showing daily hours of operation and daily production rates, and temperature and pressure drop readings, for the last 12 months. All records compiled in accordance with this permit must be maintained by Concrete Placing as a permanent business record for at least 5 years following the date of the measurement, must be submitted to the Department upon request, and must be available at the plant site for inspection by the Department (ARM 17.8.749).
3. Concrete Placing shall supply the Department with annual production information for all emission points, as required by the Department, in the annual emission inventory request. The request will include, but is not limited to, all sources identified in the most recent emission inventory report and sources identified in Section I.A of the Permit Analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

4. Concrete Placing shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).
5. Concrete Placing shall document, by month, the total concrete plant production. By the 25<sup>th</sup> day of each month, Concrete Placing shall calculate the total plant production during the previous 12 months to verify compliance with the limitation in Section II.A.5 for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.5. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

### Section III: General Conditions

- A. Inspection – Concrete Placing shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if Concrete Placing fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Concrete Placing of the responsibility for complying with any applicable federal or Montana statute, rule or standard, except as specifically provided in ARM 17.8.740, *et*

*seq.* (ARM 17.8.756).

- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Construction Commencement – Construction must begin within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked.
- H. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Concrete Placing may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.
- J. Concrete Placing shall comply with conditions contained in this permit while operating at any location in Montana, except within those areas having a Department approved permitting program.

Permit Analysis  
Concrete Placing Co., Inc.  
Permit #3319-01

I. Introduction

A. Permitted Equipment

Concrete Placing Co., Inc. (Concrete Placing) operates a portable central mix concrete batch plant, which includes a 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour), a diesel generator (up to 365 kilowatts (kW)), and associated equipment. Particulate emissions from the weigh hopper, cement silo, and cement supplement silo are controlled by a fabric filter dust collector.

B. Process Description

Concrete Placing proposes to use this concrete batch plant to produce wet mix concrete for use in various construction operations. For a typical operational setup, aggregate materials are loaded into a hopper, transferred to a conveyor, loaded into a storage bin, transferred to a scale, appropriately metered and fed to a conveyor, and loaded into a mixer. The cementitious material is pneumatically loaded into a silo (using fabric filters to control particulate emissions) and appropriately metered onto an enclosed scale and loaded into a central mixer. Aggregate, cementitious material, and water are funneled into the mixer. Materials are mixed, loaded into a truck mixer, and are transported (as cement) to the construction site.

C. Permit History

On May 27, 2004, Concrete Placing was issued **Permit #3319-00** to operate a portable central mix concrete batch plant, which includes a 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour), a diesel generator (up to 365 kW), and associated equipment. Particulate emissions from the weigh hopper, cement silo, and cement supplement silo are controlled by a fabric filter dust collector. Additionally, **Addendum 1** was established to allow this equipment to operate in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) during the summer months.

D. Current Permit Action

On September 13, 2004, Concrete Placing requested an administrative amendment to Permit #3319-00 to update Addendum 1 and allow for wintertime operations in or within 10 km of the Kalispell PM<sub>10</sub> nonattainment area. SCREEN3 VIEW modeling will be applied to allow for wintertime operations. **Permit #3319-01** replaces Permit #3319-00 and **Addendum 2** replaces Addendum 1.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and Environmental Assessments, is included in the Permit Analysis associated with each change to the permit.

## II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department of Environmental Quality (Department). Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations, or copies where appropriate.

### A. ARM 17.8, Subchapter 1 – General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule is a list of applicable definitions used in this subchapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary, using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Montana Clean Air Act, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Concrete Placing shall comply with all requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs, which can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

### B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to:

1. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM<sub>10</sub>

Concrete Placing must comply with the applicable ambient air quality standards.

### C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
  2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter (PM). (2) Under this rule, Concrete Placing shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne PM.
  3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere PM caused by the combustion of fuel in excess of the amount determined by this rule.
  4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere PM in excess of the amount set forth in this rule.
  5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.
  6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.
  7. ARM 17.8.340 Standards of Performance for New Stationary Sources. This rule incorporates, by reference, 40 Code of Federal Regulations (CFR) 60, Standards of Performance for New Stationary Sources (NSPS). The owner or operator of any stationary source or modification, as defined and applied in 40 CFR Part 60, NSPS, shall comply with the standards and provisions of 40 CFR Part 60. This plant consists of a 1994 WEMCO central mix concrete batch plant and associated equipment. NSPS (40 CFR Part 60, General Provisions and Subpart F, Portland Cement Plants) does not apply because the central mix plant does not meet the definition of an affected facility.
- D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:
1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that Concrete Placing submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. Concrete Placing was not required to submit a permit application fee for the current permit action, because the change is an administrative amendment.
  2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee

must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an Open Burning Permit, issued by the Department. This operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, as described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

- E. ARM 17.8, Subchapter 7 - Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
  2. ARM 17.8.743 Montana Air Quality Permits—When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter or use any asphalt plant, crusher or screen that has the Potential to Emit (PTE) greater than 25 tons per year of any pollutant. Concrete Placing has a PTE greater than 25 tons per year of total PM, PM<sub>10</sub>, and oxides of nitrogen (NO<sub>x</sub>); therefore, an air quality permit is required.
  3. ARM 17.8.744 Montana Air Quality Permits—General Exclusions. This rule identifies the activities that do not require a permit and are not subject to the Montana Air Quality Permit Program.
  4. ARM 17.8.745 Montana Air Quality Permits—Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
  5. ARM 17.8.748 New or Modified Emitting Units—Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. Concrete Placing was not required to submit a permit application for the current permit action because it is an administrative action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Concrete Placing was not required to submit a permit application or public notice for the current permit action because the current permit action is an administrative amendment with no increase in potential emissions.
  6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
  7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to



install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section IV of this Permit Analysis.

8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Concrete Placing of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an Environmental Impact Statement.
11. ARM 17.8.760 Additional Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those applications that require an Environmental Impact Statement.
12. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
13. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of Concrete Placing, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
14. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements contained in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
15. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a

complete notice of Intent to Transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

F. ARM 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modification--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source because it is not listed and does not have a PTE or greater than 250 tons per year (excluding fugitive emissions) of any air pollutant.

G. ARM 17.8, Subchapter 12 - Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
  - a. PTE > 100 tons/year of any pollutant,
  - b. PTE > 10 tons/year of any one Hazardous Air Pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or a lesser quantity as the Department may establish by rule, or
  - c. PTE > 70 tons/year of PM<sub>10</sub> in a serious PM<sub>10</sub> nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #3319-01 for Concrete Placing, the following conclusions were made:
  - a. The facility's PTE is less than 100 tons/year for any air pollutant.
  - b. The facility's PTE is less than 10 tons/year of any one HAP and less than 25 tons/year of all HAPs.
  - c. This source is not located in a serious PM<sub>10</sub> nonattainment area.
  - d. This facility is not subject to any current NSPS standards.
  - e. This facility is not subject to any current NESHAP standards.

f. This source is not a Title IV affected source nor a solid waste combustion unit.

g. This source is not an EPA designated Title V source.

This Concrete Placing facility is not a major stationary source since it is not a listed source and the facility's PTE is less than 250 tons per year of any pollutant (excluding fugitive emissions).

### III. Emission Inventory

Source	Tons/Year					
	PM	PM <sub>10</sub>	NO <sub>x</sub>	VOC	CO	SO <sub>x</sub>
Aggregate Delivery to Ground Storage	9.86	4.72				
Sand Delivery to Ground Storage	2.30	1.08				
Aggregate Transfer to Hopper	9.86	4.72				
Sand Transfer to Hopper	2.30	1.08				
Aggregate Transfer to Conveyor Loadout	9.86	4.72				
Sand Transfer to Conveyor Loadout	2.30	1.08				
Aggregate Transfer to Storage Bin	9.86	4.72				
Sand Transfer to Storage Bin	2.30	1.08				
Aggregate Transfer to Scales	9.86	4.72				
Sand Transfer to Scales	2.30	1.08				
Aggregate Transfer to Conveyor	9.86	4.72				
Sand Transfer to Conveyor	2.30	1.08				
Cement Unloading to Storage Silo	0.27	0.17				
Cement Supplement Unloading to Storage Silo	0.18	0.06				
Weigh Hopper Loading of Sand/Aggregate	0.01	0.01				
Central Mixer Loading of Cement/Supplement/ Sand/Aggregate	0.65	0.23				
Diesel Generator (up to 365 kW)	4.72	4.72	66.46	5.30	14.32	4.39
Haul Roads	2.74	1.23				
Total	81.53	41.22	66.46	5.30	14.32	4.39

- A complete emission inventory for Permit #3319-01 is on file with the Department. The permit emissions inventory is based upon a production rate of 350 cubic yards per hour and no hourly operational limit placed upon the generator.

### IV. BACT Determination

A BACT determination is required for any new or altered source. Concrete Placing shall install on the new or altered source the maximum air pollution control capability that is technologically practicable and economically feasible, except that BACT shall be used. A BACT analysis was not required for this permit action because the current permitting action is considered an administrative action.

### V. Existing Air Quality

Addendum 2 of Permit #3319-01 would cover this portable central mix concrete batch plant while

operating in or within 10 km of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas during the summer months (April 1 through September 30). Further, the facility would also be allowed to operate in or within 10 km of certain PM<sub>10</sub> nonattainment areas during the winter months (October 1 through March 31), including the initial site location (the NW ¼ of Section 28, Township 28 North, Range 21 West, in Flathead County, Montana). Permit #3319-01 would also cover this facility while operating in areas classified as attainment or unclassified for ambient air quality standards.

#### VI. Air Quality Impacts

Based on the information provided and the conditions established in Permit #3319-01, the amount of controlled emissions generated by this facility will not exceed any set ambient air quality standards. Thus, the limitations and conditions established in Addendum 2 would further reduce emissions in these areas and would be protective of the ambient air quality standards. In addition, this source is portable and any air quality impacts will be minimal. The conditions in Permit #3319-01 will be protective of air quality while operating at locations not located in or within 10 km of certain PM<sub>10</sub> nonattainment areas.

#### VII. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

#### VIII. Environmental Assessment

An Environmental Assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.

Addendum 2  
Concrete Placing Co., Inc.  
Permit #3319-01

An addendum to Air Quality Permit #3319-01 is issued to Concrete Placing Co., Inc. (Concrete Placing), pursuant to Section 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.765, *et seq.*, as amended, for the following:

I. Permitted Equipment

The facility includes a 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour), a diesel generator (up to 365 kilowatts (kW)), and associated equipment. Particulate emissions from the weigh hopper, cement, and cement supplement silo are controlled by a fabric filter dust collector.

II. Seasonal and Site Restrictions

Addendum 2 applies to the Concrete Placing facility while operating at any location in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) nonattainment areas (NAA). Seasonal and site restrictions apply to the facility as follows:

- A. During the winter season (October 1 - March 31) – The only location in or within 10 km of a PM<sub>10</sub> nonattainment area where Concrete Placing may operate is the NW ¼ of Section 28, Township 28 North, Range 21 West, in Flathead County, Montana.
- B. During the summer season (April 1-September 30) – Concrete Placing may operate at any location in or within 10 km of the Butte, Columbia Falls, Libby, Kalispell, Thompson Falls, and Whitefish PM<sub>10</sub> nonattainment areas.
- C. Concrete Placing shall comply with the limitations and conditions contained in Addendum 2 to Permit #3319-01 while operating at any location in or within 10 km of any of the previously listed PM<sub>10</sub> NAA. Addendum 2 shall be valid until revoked or modified. The Department reserves the authority to modify Addendum 2 at any time based on local conditions of any future site. These conditions may include, but are not limited to, local terrain, meteorological conditions, proximity to residences or other businesses, etc.

III. Limitations and Conditions

A. Operational

- 1. Concrete Placing shall not cause or authorize to be discharged into the atmosphere from the facility any vent emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
- 2. Concrete Placing shall not cause or authorize to be discharged into the atmosphere from the facility any fugitive emissions, including, but not limited to, truck loading or unloading and material transfer operations, which exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
- 3. All visible emissions from the cement and cement supplement silos shall be limited to 10% opacity averaged over 6 consecutive minutes (ARM 17.8.749).

4. Emissions from the access roads, parking lots, and general plant area shall be limited to 10% opacity averaged over 6 consecutive minutes (ARM 17.8.749).
5. Concrete Placing shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precaution limitation (ARM 17.8.749).
6. Total concrete plant production shall be limited to 744 cubic yards during any rolling 24-hour time period (ARM 17.8.749).

B. Operational Reporting Requirements

1. Concrete Placing shall provide the Department with written notification of job completion within 10 working days of job completion (ARM 17.8.749).
2. Concrete Placing shall provide written notice of relocation of the permitted equipment at least 15 days prior to the physical transfer of equipment (ARM 17.8.765).
3. Production information for the site(s) covered by this addendum shall be submitted to the Department within 30 days of completion of the project or expiration of Addendum 2. The information shall include (ARM 17.8.749):
  - a. Cubic yards of concrete produced at each site.
  - b. Hours of operation at each site.
  - c. Fugitive dust information consisting of a listing of all plant vehicles, including the following for each vehicle type:
    - i. Number of vehicles
    - ii. Vehicle type
    - iii. Vehicle weight, loaded
    - iv. Vehicle weight, unloaded
    - v. Number of tires on vehicle
    - vi. Average trip length
    - vii. Number of trips per day per vehicle
    - viii. Average vehicle speed
    - ix. Area of activity
    - x. Vehicle fuel usage (gasoline or diesel) annual total
  - d. Fugitive dust control for haul roads and general plant area:
    - i. Hours of operation of water trucks
    - ii. Application schedule for chemical dust suppressant, if applicable
4. Concrete Placing shall document, by day, the total plant production. By the 25th day of each month, Concrete Placing shall total the production for each day during the previous month to verify compliance with the limitation in Section II.A.6. A written report of the compliance verification shall be submitted annually to the Department and may be submitted along with the annual emission

inventory (ARM 17.8.749).

Addendum 2 Analysis  
Concrete Placing Co., Inc.  
Permit #3319-01

I. Permitted Equipment

Concrete Placing Co., Inc. (Concrete Placing) operates a portable 1994 WEMCO central mix concrete batch plant (maximum capacity 350 cubic yards per hour), a diesel generator (up to 365 kilowatts (kW)), and associated equipment. Particulate emissions from the weigh hopper, cement silo, and cement supplement silo are controlled by a fabric filter dust collector.

II. Process Description

For a typical operational setup, aggregate materials are loaded into a hopper, transferred to a conveyor, loaded into a storage bin, transferred to a scale, appropriately metered and fed to a conveyor, and loaded into a mixer. The cementitious material is pneumatically loaded into a silo (using fabric filters to control particulate emissions) and appropriately metered onto an enclosed scale and loaded into a central mixer. Aggregate, cementitious material, and water are funneled into the mixer. Materials are mixed, loaded into a truck mixer, and are transported (as cement) to the construction site.

III. Applicable Rules and Regulations

The following are partial quotations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department of Environmental Quality (Department). Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
2. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. A source may not increase its emissions beyond those found in its permit unless the source applies for and receives another permit.
3. ARM 17.8.765 Transfer of Permit. An air quality permit may be transferred from one person to another if:
  - a. Written notice of Intent to Transfer location and public notice is sent to the Department.
  - b. The source will operate in the new location for a period of less than 1 year.



- c. The source will not have any significant impact on any nonattainment area or any Class I area.

Concrete Placing will have to submit proof of compliance with the transfer and public notice requirements when they transfer to the location covered by this addendum and will only be allowed to stay in the new location for a period of less than 1 year. Also, the conditions and controls of this addendum will keep Concrete Placing from having a significant impact on any PM<sub>10</sub> Nonattainment Areas (NAA) covered by this permit.

#### IV. Emission Inventory

Source	Lb/Day					
	PM	PM <sub>10</sub>	NO <sub>x</sub>	VOC	CO	SO <sub>x</sub>
Aggregate Delivery to Ground Storage	4.79	2.29				
Sand Delivery to Ground Storage	1.12	0.53				
Aggregate Transfer to Hopper	4.79	2.29				
Sand Transfer to Hopper	1.12	0.53				
Aggregate Transfer to Conveyor Loadout	4.79	2.29				
Sand Transfer to Conveyor Loadout	1.12	0.53				
Aggregate Transfer to Storage Bin	4.79	2.29				
Sand Transfer to Storage Bin	1.12	0.53				
Aggregate Transfer to Scales	4.79	2.29				
Sand Transfer to Scales	1.12	0.53				
Aggregate Transfer to Conveyor	4.79	2.29				
Sand Transfer to Conveyor	1.12	0.53				
Cement Unloading to Storage Silo	0.13	0.08				
Cement Supplement Unloading to Storage Silo	0.09	0.03				
Weigh Hopper Loading of Sand/Aggregate	0.01	0.00				
Central Mixer Loading	0.32	0.11				
Diesel Generator (up to 365 KW)	25.84	25.84	364.16	29.02	78.47	24.08
Haul Roads	15.00	6.75				
Total =	76.85	49.73	364.16	29.02	78.47	24.08

- A complete emission inventory for Addendum 2 to Permit #3319-01 is on file with the Department. The emissions inventory is based upon Concrete Placing's request for wintertime operations, where SCREEN3 VIEW Modeling was applied. The limit in the addendum is based upon a production rate of 31 cubic yards per hour for the central mix concrete batch plant facility.

#### V. Existing Air Quality

On July 1, 1987, the Environmental Protection Agency (EPA) promulgated new National Ambient Air Quality Standards (NAAQS) for PM<sub>10</sub>. Due to exceedances of the national standards for PM<sub>10</sub>, the cities of Kalispell (and the nearby Evergreen area), Columbia Falls, Butte, Whitefish, Libby, Missoula, and Thompson Falls were designated by EPA as nonattainment for PM<sub>10</sub>. As a result of this designation, EPA required the Department and the City-County Health Departments to submit PM<sub>10</sub> State Implementation Plans (SIP). The SIPs consisted of emission control plans that controlled fugitive dust emissions from roads, parking lots, construction, and demolition, since technical studies determined these sources to be the major contributors to PM<sub>10</sub> emissions.

Addendum 2 to Permit #3319-01 sets conditions and limitations that allow for this portable concrete batch plant to be located in or within 10 kilometers (km) of certain PM<sub>10</sub> NAAs during the summer months (April 1-September 30). Further, the facility would also be allowed to operate in or within 10 km of certain PM<sub>10</sub> nonattainment areas during the winter months (October 1 through March 31), including the initial site location (the NW ¼ of Section 28, Township 28 North, Range 21 West, in Flathead County, Montana). Permit #3319-01 would also cover this facility while operating in areas classified as attainment or unclassified for ambient air quality standards.

VI. Taking or Damaging Implication Analysis

As required by 2-10-101 through 2-10-105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

VII. Environmental Assessment

An Environmental Assessment was not required for this permit action because the permit action is an administrative amendment.